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22 Attorneys for Plaintiffs  
23 MARIA RODAS and CARINA ALFARO

14 UNITED STATES DISTRICT COURT  
15  
16 CENTRAL DISTRICT OF CALIFORNIA

17 MARIA RODAS and CARINA  
18 ALFARO, individually and on behalf  
19 of other persons similarly situated,

20 Plaintiffs,  
21 vs.  
22 FLYING FOOD GROUP, LLC; and  
23 DOES 1 through 10.

Defendants.

Case No. 2:19-cv-436-AB-GJSx

CLASS ACTION

**PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: July 12, 2024

Time: 10:00 a.m.

Ctrm: 7B (1<sup>st</sup> Street) via Zoom

24 Please take notice that, on July 12, 2024, at 10:00 a.m. or as soon thereafter as  
25 counsel may be heard, in Courtroom 7B of the United States Courthouse for the United  
26 States District Court, Central District of California, located at 350 West First Street, Los  
27 Angeles, California, plaintiffs Maria Rodas and Carina Alfaro ("Plaintiffs") will and  
28 hereby do move for an order granting final approval of the class action settlement (the

1 “Settlement”) reached with defendant Flying Food Group, LLC (“Defendant”) that was  
2 preliminarily approved by the Court on March 11, 2024. Specifically, Plaintiffs move  
3 for an order:

4       1.     Granting final approval of the Settlement and finding that the terms of the  
5 Settlement are fair, reasonable and adequate under Rule 23(e)(2) of the Federal Rules of  
6 Civil Procedure, including the amount of the settlement fund, the amount of  
7 distributions to class members, the procedure for giving notice to class members, the  
8 procedure for objecting to or opting out of the Settlement, and the maximum amounts  
9 allocated to incentive payments, costs and attorney’s fees.

10       2.     Certifying for settlement purposes the Settlement Class described in the  
11 Settlement, comprised of all persons all persons who, at any time between January 1,  
12 2017 and November 9, 2023, worked for Flying Food Group, LLC as an hourly  
13 employee in the State of California; and certifying for settlement purposes the Shift Pay  
14 Subclass described in the Settlement, comprised of all persons who worked for  
15 Defendant as an hourly employ who received shift pay at any time when they worked at:  
16 1) the LAV facility between November 30, 2017 and March 8, 2019; 2) the LAX or LAP  
17 facility between November 30, 2017 and March 3, 2019; or 3) the SFO facility at any  
18 time between November 30, 2017 and May 17, 2019.

19       3.     Finding that class members were provided proper and adequate notice of  
20 their rights in a manner that satisfies the requirements of due process.

21       4.     Directing that all class members who did not timely request exclusion from  
22 the Settlement are barred from prosecuting against the Released Parties described in the  
23 Settlement all released claims as set forth in the Settlement.

24       5.     Directing payment from the settlement fund of settlement administration  
25 fees to Atticus Administration in the amount of \$27,000 in accordance with the  
26 Settlement.

27       6.     Directing payment from the settlement fund of settlement benefits to class  
28 members in accordance with the Settlement.

7. Awarding Plaintiffs the amount of \$19,288.71 for costs.

8. Awarding Plaintiffs the amount of \$300,000 for attorney's fees.

9. Awarding Plaintiff Rodas the amount of \$5,000 as a class representative enhancement payment and awarding Plaintiff Alfaro the amount of \$5,000 as a class representative enhancement payment.

10. Entering a final judgment dismissing the action with prejudice.

11. Providing that, notwithstanding entry of final judgment, the Court shall retain jurisdiction in this matter for the purposes of interpreting or enforcing the Settlement or final judgment

Plaintiffs' motion is made under Rule 23(e)(2) of the Federal Rules of Civil Procedure on the grounds that the Settlement is fair, reasonable and adequate; in accordance with due process, class members were provided notice of their rights under the Settlement in a reasonable manner and were given a reasonable opportunity to exclude themselves from the Settlement; and the amounts of fees, costs and enhancement awards requested by Plaintiffs are reasonable.

Plaintiffs' motion is based on this Notice; the Memorandum of Points and Authorities, Declaration of Gregory N. Karasik and Declaration of Bryn Bridley submitted herewith; all other pleadings and papers on file in this action; and any oral argument or other matter that may be considered by the Court.

This motion is made following numerous discussions with counsel for Defendant in connection with negotiating and finalizing the Settlement. Defendant does not intend to oppose Plaintiffs' motion.

Dated: June 7, 2024

KARASIK LAW FIRM  
LAW OFFICE OF SAHAG MAJARIAN, II  
MOON LAW GROUP PC

By s/ *Gregory N. Karasik*  
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Attorneys for Plaintiffs